

APR 22 1994

P.2.1

Mr. Samuel S. Waldo
Director of Environmental Affairs
Amphenol Corporation
358 Hall Avenue
P.O. Box 5030
Wallingford, Connecticut 06492-7530

HRE-8J

Re: Administrative Order on Consent
Franklin Power Products/
Amphenol IND 044 587 848

Dear Mr. Waldo:

The United States Environmental Protection Agency (U.S. EPA) is in receipt of your letter dated March 25, 1994, which you submitted in response to U.S. EPA's letter of March 11, 1994. U.S. EPA's letter of March 11, 1994, prescribed a sampling program to be implemented by Respondents for the purposes of completing the RCRA Facility Investigation, required by the Administrative Order on Consent, dated November 27, 1990.

Your recent letter proposes, due to the difficulty of obtaining sufficient sample material by the geoprobe method, that cyanide and metal analyses be omitted for soil samples collected at Forsythe Street. U.S. EPA previously approved the geoprobe method of sampling for residential areas because this method is less invasive than the conventional drilling method. Since cyanide and metal analyses of groundwater samples is required at the Forsyth Street sample locations, cyanide and metal analysis of soil samples will not be required. All other sampling and analysis shall be performed as prescribed in the U.S. EPA letter of March 11, 1994.

Your letter of March 25, 1994, stated your intent to implement an interim corrective measure (ICM) consisting of a ground water recovery and treatment system. Again, U.S. EPA expresses its approval of such action and encourages the implementation of the ICM recovery/treatment system.

If you have any questions please call William Buller at (312) 886-4568.

Sincerely yours,

Kevin M. Pierard, Chief
Technical Enforcement Section #1
RCRA Enforcement Branch

cc: Thomas Linson, IDEM

3/11/94

HRE-8J

CERTIFIED MAIL RETURN
RECEIPT REQUESTED

Mr. Samuel S. Waldo
Director of Environmental Affairs
Amphenol Corporation
358 Hall Avenue
P.O. Box 5030
Wallingford, Connecticut 06492-7530

Re: Administrative Order on Consent
Franklin Power Products/
Amphenol Corporation
IND 044 587 848

Dear Mr. Waldo:

This letter is in follow-up to the February 24, 1994, telephone conference of Franklin Power Products/Amphenol and the United States Environmental Protection Agency (U.S. EPA) representatives. U.S. EPA concludes that additional data is required to complete the RCRA Facility Investigation (RFI) and pursuant to the terms of Section VII 2.a.(4)(c)(iii) of the Administrative Order on Consent (AOC), dated November 27, 1990, U.S. EPA directs Respondents to perform additional work as prescribed below.

All samples shall be collected in accordance with the methodologies as set forth in U.S. EPA's letter to Respondents dated January 21, 1994. Respondents shall collect ground-water samples at the approximate locations numbered 1, 2, and 3 in Attachment I. At least one soil sample shall also be collected at these same locations at depth intervals about midway between the base of the sanitary sewer line and the water table. All samples shall be analyzed for volatile organic compounds (VOCs), cyanide, and the list of metals previously applied to groundwater samples. The sampling/analysis results shall be included in a revised RFI report which shall be submitted within sixty (60) days of receipt of this letter.

In our recent telephone conference Respondents once again proposed an alternative to collecting samples at the locations as directed in our December 14, 1993, and January 21, 1994, letters. However, in addition to proposing collecting groundwater samples for VOC analysis from the Hurricane Creek stream bed during no-flow conditions, the Respondents have proposed to proceed with the Corrective Measures Study (CMS) on a parallel tract while awaiting for the appropriate conditions at Hurricane Creek. Prior to

Questions on legal matters should be addressed to Joseph Cooley at (312) 886-5313, questions on the ecological risk assessment addressed to Diane Sharrow at (312) 886-6199, and all other issues addressed to William Buller at (312) 886-4568.

Sincerely yours,

Kevin M. Pierard, Chief
Technical Enforcement Section #1

cc: J. Michael Jarvis, Franklin Power Products
James Keith, WW Engineering and Science

bcc: Joe Cooley, (ORC)
Diane Sharrow, (REB)

HRE-8J\WBULLER\ab\6-4568\f:...tes.#1\FPPALET.MAR\March 10, 1994

OFFICIAL FILE COPY

CONCURRENCE REQUESTED FROM REB			
SEC/BR SECRTRY	AB 10 MAR 94		
OTHER STAFF	REB STAFF	REB SECTION CHIEF	REB BRANCH CHIEF
	WAB 3/11/94	WAB 3/11/94	

3/4/94 *lhr*